

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

HRD CORPORATION d/b/a
MARCUS OIL & CHEMICAL

DEBTOR

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§

Case No. 11-36020
Chapter 11

NOTICE OF THE ORAL AND VIDEOTAPED DEPOSITION
OF MARCUS OIL & CHEMICALS, PVT
a/k/a MARCUS OIL & CHEMICALS PVT, LTD.
a/k/a MARCUS OILS & CHEMICALS PRIVATE LIMITED

Dr. Ebrahim Bagherzadeh, Creditor, hereby provides notice of his intent to take the videotaped deposition of the corporate representative of MARCUS OIL & CHEMICALS, PVT a/k/a MARCUS OIL & CHEMICALS PVT, LTD. a/k/a MARCUS OILS & CHEMICALS PRIVATE LIMITED beginning at 10:00 a.m. on Monday, October 17, 2011. The deposition will take place at the law firm of Beck Redden & Secrest, LLP, 1221 McKinney, Suite 4500, Houston, Texas 77010, and will be taken by videotape and regular stenographic reporting.

The corporate representative will be questioned on the subjects and documents listed on the attached Exhibit A.

Respectfully submitted,

BECK, REDDEN & SECREST

/s/ Murray Fogler

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**ATTORNEYS FOR DR. EBRAHIM
BAGHERZADEH**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing instrument was filed electronically on September 16, 2011 in compliance with Local Rule LR5.3. As such, this notice was served on all counsel of record who are deemed to have consented to electronic service. Pursuant to Fed.R.Civ.P. 5(d) and Local Rule LR5.3, all other counsel of record or parties in interest not deemed to have consented to electronic service were served with a true and correct copy of the foregoing instrument by U.S. First Class Mail and/or facsimile on the 16th day of September, 2011.

/s/ Murray Fogler

MURRAY FOGLER

EXHIBIT "A"

SUBJECTS OF EXAMINATION

1. All contracts between HRD Corporation and Marcus Oil & Chemicals, PVT, a/k/a Marcus Oil & Chemicals PVT, Ltd., a/k/a Marcus Oils & Chemicals Private Limited ("Marcus Oil India").
2. All loans by Marcus Oil India to HRD.
3. All debts of HRD to Marcus Oil India.
4. All patent assignments, patent licenses and other patent related transactions between HRD and Marcus Oil India.
5. All sales, consignments or shipments of goods from Marcus Oil India to HRD or any customer of HRD.
6. All sales, consignments or shipments of goods from HRD to Marcus Oil India or any customer of Marcus Oil India
7. All patents, patent applications or intellectual property of HRD.
8. All patents, patent applications or intellectual property of Marcus Oil India which are filed or recorded in any patent office of any country or international patent authority.
9. All patents, patent applications or intellectual property claimed by Marcus Oil India under the terms of any assignment or instrument of transfer including, but not limited to that certain Patent Assignment Agreement dated December 21, 2005, allegedly executed by HRD and Marcus Oil India.
10. Any payments, value or other consideration given by Marcus Oil India to HRD for the Patent Assignment Agreement.
11. The accounting of all sales, consignments or other business dealings or transactions between HRD and Marcus Oil India.
11. The management, directors and equity owners of Marcus Oil India.
12. All general ledgers, trial balances, balance sheets, income statements and other books and records prepared by or for Marcus Oil India, which depict any transactions,

receivables, payables, capital contributions, loans, advances or other transactions between Marcus Oil India and HRD.

13. All promissory notes, security agreements, loan documents or other documents evidencing any debt or loan between HRD and Marcus Oil India since the formation of Marcus Oil India and all documents evidencing advances, repayments and interest accrual on such debts or loans.

13. All transfers of money or property between HRD and Marcus Oil India within four (4) years of the petition date.

14. The documents described on Exhibit A attached hereto and the custodianship of the documents, books and records described therein.

DOCUMENTS TO BE PRODUCED

1. All general ledgers, trial balances, balance sheets, income statements and other books and records prepared by or for Marcus Oil India, which depict any transactions, receivables, payables, capital contributions, loans, advances or other transactions between Marcus Oil India and HRD.
2. All contracts, assignments or bills of sale of any kind between HRD and Marcus Oil India since the formation of Marcus Oil India.
3. All promissory notes, security agreements, loan documents, letters of credit or other documents evidencing any debt or loan between HRD and Marcus Oil India since the formation of Marcus Oil India and all documents evidencing advances, repayments and interest accrual on such debts or loans.
4. All documents evidencing or relating to transfers of money or property between HRD and Marcus Oil India within four (4) years of the date HRD filed its bankruptcy petition and from the petition date to the present date.
5. All documents describing or depicting the purpose or consideration for each transfer of money or property between HRD and Marcus Oil India within four (4) years of the petition date, and from the petition date to the present date, including invoices, bills of lading and shipping documents.
6. All documents constituting, describing or relating to patent assignments, patent licenses and other patent related transactions between HRD and Marcus Oil India.
5. All documents constituting, describing or relating to sales, consignments or shipments of goods from Marcus Oil India to HRD or any customer of HRD.
6. All documents constituting, describing or relating to sales, consignments or shipments of goods from HRD to Marcus Oil India or any customer of Marcus Oil India
7. All documents constituting, describing or relating to patents, patent applications or intellectual property of HRD.
8. All documents constituting, describing or relating to patents, patent applications or intellectual property of Marcus Oil India which are filed or recorded in any patent office of any country or international patent authority.

9. All documents constituting, describing or relating to patents, patent applications or intellectual property claimed by Marcus Oil India under the terms of any assignment or instrument of transfer including, but not limited to that certain Patent Assignment Agreement dated December 21, 2005, allegedly executed by HRD and Marcus Oil India.

10. Any documents constituting, describing or relating to payments, value or other consideration given by Marcus Oil India to HRD for the Patent Assignment Agreement.

11. The documents constituting, describing or relating to accounting of all sales, consignments or other business dealings or transactions between HRD and Marcus Oil India.

SERVICE LIST

Harris County c/o Tara L. Grundemeier P.O. Box 3064 Houston, TX 77253-3064	Baker Botts LLC 1299 Pennsylvania Avenue, NW Washington, DC 20004-2408
Centerpoint Energy Services, Inc. 1111 Louisiana Street, 30 th Floor Houston, TX 77002-5230	City of Houston c/o Denise L. Miller P.O. Box 368 Houston, TX 77001-0368
DHL Danzas 14076 Collections Center Drive Chicago, IL 60693-0140	DHL Global Forwarding 14076 Collections Center Drive Chicago, IL 60693-0140
Dow Chemicals Dow Center Midland, MI 48674-0001	Harris County, et al c/o John P. Dillman Linebarger Goggan Blair & Sampson LLP P.O. Box 3064 Houston, TX 77253-3064
Houston Linens c/o John P. Dillman Linebarger Goggan Blair & Sampson LLP P.O. Box 3064 Houston, TX 77253-3064	Internal Revenue Service P.O. Box 7346 Philadelphia, PA 19101-7346
Mode Transportation 3050 Highland Parkway, Suite 100 Downers Grove, IL 60515-5565	Pitney Bowes 1 Elmcroft Road Stamford, CT 06926-0700
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